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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

REAL PROPERTY IN LOS ANGELES,
CALIFORNIA,

Defendant.

No. 2:22-cv-02902-JLS-PDx

SUPPLEMENTAL STIPULATION MODIFYING
ORDER AUTHORIZING INTERLOCUTORY
SALE OF REAL PROPERTY AND
SUBSTITUTION OF RES

[Proposed Order Lodged Herewith]

1 IT IS HEREBY STIPULATED by and between the United States of
2 America (the "United States") and WRH, Inc. (the "Titleholder")
3 (collectively the "Parties"), by and through their attorneys, to
4 modify the interlocutory sale stipulation filed on August 23, 2022
5 (Dkt. 33) (the "ISS"), and to request that the Court amend its
6 associated order entered on August 29, 2022 (Dkt. 36) as follows:

7 1. For a period of 180 days from the entry of the order
8 modifying the ISS, the United States Marshals Service ("USMS") and
9 its national real property contractor shall have authority and
10 responsibility for routine maintenance on the Property (as defined in
11 the ISS) and authority to make minor modifications to the Property to
12 improve the Property's marketability and to deduct costs and expenses
13 for the foregoing from the sale proceeds in accordance with Paragraph
14 15(a) of the ISS. The USMS shall have authority to undertake
15 expenditures of up to \$20,000 before giving notice to Titleholder and
16 shall seek Titleholder or Court authorization to make expenditures
17 beyond that amount. At the end of the 180-day period, the authority
18 and responsibilities described above shall revert to Titleholder as
19 originally specified in the ISS, unless the Parties agree in writing
20 to extend the period of delegation to USMS. Except as to the routine
21 maintenance and minor modifications stated above, paragraph 22 of the
22 ISS remains unmodified.

23 2. The USMS's real property contractor, its principals,
24 employees and agents (and those of prospective buyers) shall be
25 permitted to enter the Property for purposes of marketing the
26 Property or the routine maintenance and minor modifications stated
27 //

1 above without providing the 24 hours' notice as stated in paragraph
2 23 of the ISS.

3 SO STIPULATED.

4 Dated: December 8, 2023

MARGARET A. MOESER, Acting Chief
Money Laundering and Asset Recovery
Section, Criminal Division
United States Department of Justice

7 /s/ Hunter Smith
D. HUNTER SMITH, Trial Attorney

8 E. MARTIN ESTRADA
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12 Chief, Asset Forfeiture Section

13 /s/ Maxwell Coll
MAXWELL COLL
14 Assistant United States Attorney

15 Attorneys for Plaintiff
UNITED STATES OF AMERICA

16
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18 Dated: December 8, 2023

/s/ (per email authorization)¹
EPHRAIM WERNICK
19 Vinson & Elkins LLP

20 Attorney for Titleholder
21 WRH, Inc.

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¹ Pursuant to Local Rule 5-4.3.4(a)(2)(i), the government attests that the signatory listed, and on whose behalf the filing is submitted, concurs in the filing's content and has authorized the filing.